

LATHAM & WATKINS LLP
Christopher S. Yates (Cal. Bar No. 161273)
chris.yates@lw.com
Belinda S Lee (Cal. Bar No. 199635)
belinda.lee@lw.com
Aaron T. Chiu (Cal. Bar No. 287788)
aaron.chiu@lw.com
505 Montgomery Street, Suite 2000
San Francisco, California 94111-6538
Telephone: +1.415.391.0600
Fax: +1.415.395.8095

LATHAM & WATKINS LLP
Sean M. Berkowitz (*pro hac vice* forthcoming)
sean.berkowitz@lw.com
330 North Wabash Avenue, Suite 2800
Chicago, Illinois 60611
Telephone: +1.312.876.7700
Fax: +1.312.993.9767

Attorneys for Defendants Broadcom Inc., Broadcom Corporation and Avago Technologies International Sales Pte. Limited

[Additional Counsel on Signature Page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SAMSUNG ELECTRONICS CO., LTD.

Plaintiffs,

v.

BROADCOM INC., BROADCOM CORPORATION, AND AVAGO TECHNOLOGIES INTERNATIONAL SALES PTE. LIMITED,

Defendant.

CASE NO. 3:24-cv-03959-LB

STIPULATION FOR EXTENSION OF TIME FOR DEFENDANTS BROADCOM INC., BROADCOM CORPORATION, AND AVAGO TECHNOLOGIES INTERNATIONAL SALES PTE. LIMITED TO RESPOND TO THE COMPLAINT PURSUANT TO CIVIL LOCAL RULE 6-1(A)

1 Plaintiff Samsung Electronics Co., Ltd. (“Plaintiff”) and Defendants Broadcom Inc.,
 2 Broadcom Corporation, and Avago Technologies International Sales Pte. Limited (“Defendants”
 3 and, together with Plaintiffs, the “Parties”), by and through their respective attorneys of record
 4 herein and without waiving any rights, claims, or defenses they have in this action, enter into this
 5 Stipulation pursuant to Civil Local Rule 6-1(a), with reference to the following circumstances:

6 WHEREAS, Plaintiffs filed the Complaint on July 1, 2024 (ECF No. 1);

7 WHEREAS, Plaintiffs purported to have served Defendants with a copies of the Summons
 8 and Complaint on July 3, 2024 (ECF Nos. 7–9);

9 WHEREAS, Defendants’ response to the Complaint is currently due on July 24, 2024;

10 WHEREAS, Defendants are evaluating their response to the Complaint and require
 11 additional time for their response;

12 WHEREAS, counsel for the Parties conferred telephonically and by email and have agreed
 13 to extend Defendants’ deadline to respond to the Complaint to August 28, 2024;

14 WHEREAS, the stipulated extension of Defendants’ response deadline to the Complaint
 15 will not affect any deadlines currently set by the Court or other applicable rules;

16 WHEREAS, the Parties have not previously stipulated to any extensions of time;

17 WHEREAS, the Parties agree that nothing in this Stipulation shall be construed as a waiver
 18 of any Party’s rights or positions in law or in equity and that all Parties expressly reserve and do
 19 not waive arguments or defenses that Party would otherwise have as of the date of this Stipulation.

20 NOW THEREFORE, the Parties, through their respective attorneys of record, hereby
 21 stipulate and agree to extend Defendants’ deadline to respond to the Complaint to August 28, 2024.

22 **IT IS SO STIPULATED.**

23
 24 *[Signatures on following page]*
 25
 26
 27
 28

1 Dated: July 23, 2024

LATHAM & WATKINS LLP

2 By: /s/ Belinda S Lee

Belinda S Lee

3 Christopher S. Yates (Cal. Bar No. 161273)

4 *chris.yates@lw.com*

Belinda S Lee (Cal. Bar No. 199635)

5 *belinda.lee@lw.com*

Aaron T. Chiu (Cal. Bar No. 287788)

6 *aaron.chiu@lw.com*

505 Montgomery Street, Suite 2000

7 San Francisco, California 94111-6538

Telephone: +1.415.391.0600

8 Fax: +1.415.395.8095

9 Sean M. Berkowitz (*pro hac vice* forthcoming)

sean.berkowitz@lw.com

10 330 North Wabash Avenue, Suite 2800

Chicago, Illinois 60611

11 Telephone: +1.312.876.7700

Fax: +1.312.993.9767

12 *Attorneys for Defendants Broadcom Inc.,*

13 *Broadcom Corporation and Avago Technologies*

14 *International Sales Pte. Limited*

15 Dated: July 23, 2024

ARNOLD & PORTER LLP

16 By: /s/ Douglas A. Winthrop

Douglas A. Winthrop

18 Douglas A. Winthrop (Cal. Bar No. 183532)

Douglas.Winthrop@arnoldporter.com

19 Daniel B. Asimow (Cal. Bar No. 165661)

Daniel.Asimow@arnoldporter.com

20 Jee Heun ("Jeenie") Kahng (Cal. Bar No. 348556)

jeenie.kahng@arnoldporter.com

21 Three Embarcadero Center, 10th Floor

22 San Francisco, CA 94111-4024

Telephone: 415.471.3100

23 Facsimile: 415.471.3400

24 Jonathan I. Gleklen (*pro hac vice*)

Jonathan.Gleklen@arnoldporter.com

601 Massachusetts Ave., NW

25 Washington, DC 20001

Telephone: 202.942.5000

26 Facsimile: 202.942.5999

27 *Attorneys for Plaintiff Samsung Electronics Co.,*
28 *Ltd.*

ATTESTATION

I am the ECF user whose identification and password are being used to file the foregoing Stipulation for Extension of Time for Defendants Broadcom Inc., Broadcom Corporation, and Avago Technologies International Sales Pte. Limited to Respond to the Complaint Pursuant to Civil Local Rule 6-1(a). Pursuant to Civil Local Rule 5-1(i)(3), I attest that all other signatories listed, and on whose behalf the filing is submitted, concur in this filing's content and have authorized such filing.

Dated: July 23, 2024

/s/ Belinda S Lee

Belinda S Lee